

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

WILLIAM F. WINGATE,

Plaintiff,

v.

CITY OF SEATTLE, SEATTLE POLICE
DEPARTMENT AND CYNTHIA WHITLATCH,
in her official and individual capacities,

Defendants.

NO.

NOTICE OF REMOVAL

TO: The United States District Court for the Western District of Washington at Seattle

Defendant Cynthia Whitlatch hereby gives notice that she is removing this case to the United States District Court for the Western District of Washington at Seattle on the grounds set forth below:

1. On or about April 28, 2015, plaintiff served a Summons and Complaint for Damages upon defendant. The Summons and Complaint was originally filed with the Superior Court for the State of Washington for King County on or about April 23, 2015, and denominated Cause No. 15-2-

NOTICE OF REMOVAL - 1

CHRISTIE LAW GROUP, PLLC
2100 WESTLAKE AVENUE N., SUITE 206
SEATTLE, WA 98109
206-957-9669

1 09969-8 SEA. On or about April 28, 2015, plaintiff filed an Amended Complaint for Damages.

2 2. This Notice is being filed within 30 days of defendant's initial receipt of plaintiff's
3 Amended Complaint. All of the defendants in the above matter agree to the removal of this case to
4 the United States District Court.

5 3. This is a civil action alleging deprivation of the plaintiff's constitutional rights in
6 violation of 42 U.S.C. § 1983.

7 4. 28 U.S.C. § 1441(b) provides in part as follows:

8 Any civil action of which the district courts have original jurisdiction
9 founded on a claim or a right arising under the Constitution, treaties
or laws of the United States shall be removable without regard to the
citizenship or residence of the parties.

10 5. Plaintiff's Amended Complaint alleges violations of the United States Constitution
11 under 42 U.S.C. § 1983. This Court has original jurisdiction over this action pursuant to 28 U.S.C.
12 § 1441. Removal is proper to the Western District of Washington at Seattle because the district and
13 division embrace King County, which is where the defendants are located and where the events
14 giving rise to this suit occurred.

15 A true and correct copy of the Amended Complaint served upon this defendant is attached
16 hereto as Exhibit 1.

17 WHEREFORE, defendant gives notice that the court action pending against her in King
18 County Superior Court has been removed from that court to the United States District Court for the
19 Western District of Washington at Seattle.

20 / / /

21 NOTICE OF REMOVAL - 2

CHRISTIE LAW GROUP, PLLC
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1 DATED this 26th day of May, 2015.

2 CHRISTIE LAW GROUP, PLLC

3 By /s/ Robert L. Christie
4 ROBERT L. CHRISTIE, WSBA #10895
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NOTICE OF REMOVAL - 3

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CERTIFICATE OF SERVICE

I hereby certify that on May 26, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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CHRISTIE LAW GROUP, PLLC

By /s/ Robert L. Christie
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